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7 HAYWARD AREA RECREATION AND PARK  
DISTRICT and KEVIN HART

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ  
BOLBOL, individually,

Case No. 3:23-cv-01652-VC

**Plaintiff,**

**STIPULATION AND [PROPOSED] ORDER  
REGARDING MOTION FOR SUMMARY  
JUDGMENT BRIEFING SCHEDULE**

ROWELL RANCH RODEO, INC.,  
HAYWARD AREA RECREATION AND  
PARK DISTRICT, HAYWARD AREA  
RECREATION AND PARK DISTRICT  
PUBLIC SAFETY MANAGER/RANGER  
KEVIN HART, and DOES 1 and 2, in  
their individually and official capacities,  
jointly and severally,

## Defendants.

To the Honorable Judge Chhabria:

The parties have met and conferred regarding a briefing schedule for their respective Motions for Summary Judgment. Plaintiffs DENIZ BOLBOL and JOSEPH P. CUVIELLO (“Plaintiffs”) filed their Joint Motion for Partial Summary Judgment (Docket 84) on June 3, 2024. Defendants (1) ROWELL RANCH RODEO, INC., (2) HAYWARD AREA RECREATION AND PARK DISTRICT/HAYWARD AREA RECREATION AND PARK DISTRICT PUBLIC SAFETY MANAGER/RANGER KEVIN HART, and (3) ALAMEDA COUNTY and ALAMEDA COUNTY DEPUTY SHERIFF JOSHUA MAYFIELD (“Defendants”) each plan to

1 file their respective Motions for Summary Judgment. Based on the anticipated cross motions for  
2 summary judgment, the parties agreed to the following briefing schedule in order to maintain  
3 compliance with Judge Chhabria' Standing Order, Paragraph 41.

- 4     1. **June 3, 2024** - Plaintiffs' filed Joint Motion for Partial Summary Judgment – (Dkt. 84 et  
5       al).
- 6     2. **June 27, 2024** - Defendants' Oppositions and Cross Motions for Motions for Summary  
7       Judgment Due.
- 8     3. **July 25, 2024** - Plaintiffs' Reply to Def. Opposition/Plaintiffs' Opposition to Def. Motion  
9       for Summary Judgment Due.
- 10    4. **August 1, 2024** – Defendants' Reply to Plaintiffs' Oppo. to Def. Motion for Summary  
11      Judgment Due.
- 12    5. **August 15, 2024** – Hearing Date (Same date as current Motion for Summary Judgment).

13 IT IS SO ORDERED.

14  
15 APPROVED BY:

16   
17

18 JUDGE VINCE CHHABRIA

19 Respectfully submitted,

20 Dated: June 13, 2024

21 ALLEN, GLAESNER,  
HAZELWOOD & WERTH, LLP

22 By: /s/ Nicholas D. Syren  
23 DALE L. ALLEN, JR.  
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24 Attorneys for Defendants  
HAYWARD AREA RECREATION AND  
25 PARK DISTRICT and KEVIN HART

